

EXHIBIT D

<u>DEPONENT</u>	<u>AFFILIATION</u>	<u>DEFENDANT POSITION/OBJECTION</u>
Donald Aleong	Tauber Oil	Will provide a date.
Patricia Bock	Tauber Oil	Objection. Ms. Bock is a former employee. Defendant does not have control over this witness and is presently unaware of the status or location of the former employee. Plaintiffs needed to have served a subpoena.
Michael Price	Tauber Oil	Will provide a date.
David J. Swayne	Tauber Oil	Will provide a date.
Frederick Barratt	Hovic/Hovensa	Objection. Mr. Barratt is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Woodworth Cummings	Hovic/Hovensa	Objection. Mr. Cummings is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Nick Horler	ConocoPhillips Company & Chevron Phillips Chemical Puerto Rico CORE LLC	Objection. Mr. Horler is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Mark D. Scharre	ConocoPhillips Company & Chevron Phillips Chemical Puerto Rico CORE LLC	Objection. Mr. Scharre is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Fred Sisson	ConocoPhillips Company & Chevron Phillips Chemical Puerto Rico CORE LLC	Objection. Mr. Sisson is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Samuel Cruz	Esso Standard Oil (Puerto Rico)	Objection. Mr. Cruz is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Carlos Figueroa	Esso Standard Oil (Puerto Rico)	Defendant will provide a date for Mr. Figueroa's deposition. Mr. Figueroa lives in Puerto Rico and will be available for deposition in San Juan.
Arturo Hernandez	Esso Standard Oil (Puerto Rico)	Defendant has proposed dates for Mr. Hernandez's deposition in December. Defendant is also exploring potential dates for Mr. Hernandez's deposition in November. Defendant will agree to produce him in Miami, FL.
Robert McGrath	ExxonMobil	Defendant will provide a date for Mr. McGrath's deposition. Mr. McGrath works in Fairfax, VA and will be available for deposition in Washington, D.C.

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Augusto Munoz-Lacot	Esso Standard Oil (Puerto Rico)	Defendant will provide a date for Mr. Munoz-Lucat's deposition. Although Mr. Munoz-Lucat is a former employee, he has agreed to serve as a 30(b)(6) on a discrete topic for the company. Mr. Munoz-Lacot lives in Puerto Rico and will be available for deposition in San Juan. Objection. Mr. Salas is a former employee of Exxon Trading InterAmerica, Inc. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Norman Salas	Exxon Trading InterAmerica, Inc.	Objection. Ms. Sia is a former employee. Defendant does not have control over her. Plaintiffs needed to have served a subpoena. Objection. Mr. Fernandez is a former employee of Shell Company Puerto Rico Limited. Defendant does not have control over him. Plaintiffs needed to have served a subpoena. On information and belief, he does not reside within the Commonwealth of Puerto Rico.
Helen Sia	Esso Standard Oil (Puerto Rico)	 Objection. Mr. Marrero is a former employee of SOL. Defendant does not have control over him. In addition, Mr. Marrero was identified to Plaintiffs in discovery responses as a person with knowledge in April 2010 (more than 3 years ago), and as an ESI Custodian in April 2013. Plaintiffs needed to have served a subpoena, and there is not basis for their delay.
Luis Fernandez	SOL	 Objection. Shell objects on the grounds of relevance. Mr. Fenz worked in the Finance Dept and was involved in the sale of the stock of the entity known as Shell Company Puerto Rico Limited, now known as Sol Puerto Rico Limited.
Jose Marrero	SOL	 Objection. Shell objects on the grounds of relevance. Mr. Lewis in Houston, TX. He will be produced in London, UK, where he lives and works.
R. Krug Fenz	Shell	 Objection. Mr. Rodriguez is/was not an employee of Shell Chemical Yabucoa, Inc., Shell Oil Company, Shell Trading (US) Company, Shell Western Supply & Trading, or Shell International Petroleum Company (collectively, "Shell"). Shell objects on the grounds that Shell does not have control over him.
David Lewis	Shell	 Objection. Mr. Rodriguez is/was not an employee of Shell Chemical Yabucoa, Inc., Shell Oil Company, Shell Trading (US) Company, Shell Western Supply & Trading, or Shell International Petroleum Company (collectively, "Shell"). Shell objects on the grounds that Shell does not have control over him.
Carlos Rodriguez	N/A	

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Hans Rutzen	Shell	Objection. Mr. Rutzen is a former Shell Chemical Yabucoa, Inc. employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Eneida Hernandez Morales	SOL	Objection. Ms. Hernandez Morales is a former employee of Shell Company Puerto Rico Limited. Defendant does not have control over her. Plaintiffs needed to have served a subpoena.
Augustin Lledo	Puerto Rico Sun Oil	Objection. Mr. Lledo is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Stephen R. Walker	Puerto Rico Sun Oil	Objection. Mr. Walker is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Jose Ferrer	Puerto Rico Sun Oil	Objection. Mr. Ferrer is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.
Juan Lopez	Puerto Rico Sun Oil	Objection. Mr. Lopez is a former employee. Defendant does not have control over him. Plaintiffs needed to have served a subpoena.